



From: "Schiltz, Matthew G." <MSchiltz@schiffhardin.com>
Sent: 7/15/2016 5:26:17 PM +0000
To: "Judge, Jonathan" <jjudge@schiffhardin.com>; "Parsons, Jeffrey" <jparsons@bmpllp.com>
Subject: RE: Hinson - post-trial options memo

Jeff - I'm in my office and happy to talk at your convenience.

Matt

312-258-5536

From: Judge, Jonathan
Sent: Friday, July 15, 2016 12:00 PM
To: Parsons, Jeffrey
Cc: Schiltz, Matthew G.
Subject: RE: Hinson - post-trial options memo

Jeff,

Please call my colleague Matt Schiltz (312-258-5536). Matt tried the case with me and know the exhibits quite well.

Jonathan

From: Parsons, Jeffrey
Sent: Friday, July 15, 2016 12:26 PM
To: Judge, Jonathan
Subject: RE: Hinson - post-trial options memo

Jon,

Is there someone else at your firm who is equally knowledgeable about the evidence at trial? If so, I'd like to speak with him or her - or with you later this afternoon.

From my review of the transcripts thus far, I cannot find any evidence offered by plaintiff to support the proposition that the seat was unreasonably dangerous to use without a warning that it should not be used by children under 2. The only evidence I can find that gets close is the American Pediatric Academy's recommendation that children under 2 should be seated rear facing because it is "five times safer" - which is not the same as saying that front faced seating under 2 is "unreasonably dangerous".

Thus, I am wondering whether Plaintiff actually met its burden of proof or whether there is insufficient evidence to support the jury's verdict.

Jeff

Jeffrey R. Parsons
Beirne, Maynard & Parsons, LLP
1300 Post Oak Blvd., 25th Floor
Houston, TX 77056
713-960-7302 (Direct)
713-825-8830 (Cell)
713-960-1527 (Fax)
jparsons@bmpllp.com

EXHIBIT A

IRONSHORE0004204